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Attorneys for Petitioner
Marcy Simon
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8 UNITED STATES DISTRICT COURT
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10 NORTHERN DISTRICT OF CALIFORNIA
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12 SAN FRANCISCO DIVISION

13 MARCY SIMON, an individual residing in New
York,

14 Petitioner,

15 v.

16 MAPLE BEACH VENTURES, LLC, a Nevada
17 limited liability company; MAPLE BEACH
18 VENTURES ONE, LLC, a Wyoming limited
19 liability company; and MAPLE BEACH
liability company,

20 Respondents.
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CASE NO.: 3:21-mc-80013

**DECLARATION OF KERRY GARVIS
WRIGHT IN SUPPORT OF PETITIONER
MARCY SIMON'S ADMINISTRATIVE
MOTION TO SEAL DOCUMENTS
PURSUANT TO CIVIL LOCAL RULES 7-11
AND 79-5(e)**

DECLARATION OF KERRY GARVIS WRIGHT

I, KERRY GARVIS WRIGHT, declare as follows:

1. I am an attorney at law duly licensed to practice before the Northern District of California and all courts of the State of California and am a partner in the law firm of Glaser Weil Fink Howard Avchen & Shapiro LLP, attorneys of record for Petitioner Marcy Simon ("Petitioner" or "Ms. Simon"). I make this declaration in support of Petitioner Marcy Simon's Administrative Motion to Seal Documents Pursuant to Civil Local Rules 7-11 and 79-5(e). The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. The documents or portions thereof that Ms. Simon seeks to file under seal have been designated as confidential by virtue of confidentiality provisions contained in certain agreements between Respondent Maple Beach Ventures, LLC and/or another third party, on the one hand, and Ms. Simon, on the other hand.

3. Ms. Simon seeks to file under seal the following documents or portions thereof:

- a. Portions of Ms. Simon's Notice of Petition and Petition to Confirm Arbitration Award and for Entry of Judgment [Page 1, lines 6-12, 23-28; pages 2 to 7; page 8, lines 1-14, 21-24; page 10, lines 1-10];
- b. Portions of the Declaration of Kerry Garvis Wright in Support of Ms. Simon's Petition to Confirm Arbitration Award and for Entry of Judgment ("Garvis Wright Decl. iso Petition") [Page 2, portions of ¶¶ 2-8];
- c. Garvis Wright Decl. iso Petition, Exhibit 1 in its entirety;
- d. Garvis Wright Decl. iso Petition, Exhibit 2 in its entirety;
- e. Garvis Wright Decl. iso Petition, Exhibit 3 in its entirety;
- f. Garvis Wright Decl. iso Petition, Exhibit 4 in its entirety;
- g. Garvis Wright Decl. iso Petition, Exhibit 5 in its entirety;
- h. Garvis Wright Decl. iso Petition, Exhibit 6 in its entirety; and
- i. Garvis Wright Decl. iso Petition, Exhibit 7 in its entirety.

1 I declare under penalty of perjury pursuant to the laws of the United States of America
2 that the foregoing facts are true and correct.

3 Executed on January 19, 2021 at Los Angeles, California.

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